

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Illinois Commerce Commission)	
On Its Own Motion)	
)	
-vs-)	Docket No. 00-0494
)	
Central Illinois Light Company)	
Central Illinois Public Service Company)	
Commonwealth Edison Company)	
Illinois Power Company)	
Interstate Power Company)	
MidAmerican Energy Company)	
Mt. Carmel Public Utility Co.)	
South Beloit Water, Gas, and Electric Company,)	
and Union Electric Company)	
)	
Proceeding on the Commission's own Motion)	
concerning delivery services tariffs of all Illinois)	
electric utilities to determine what if any)	
changes should be ordered to promote statewide)	
uniformity of delivery services and related)	
tariffed offerings.)	

PETITION FOR LEAVE TO INTERVENE

COMES NOW A. E. Staley Manufacturing Company, A. Finkl & Sons, Abbott Laboratories, Inc., Archer-Daniels-Midland Company, Cargill, Inc., Caterpillar, Inc., Continental General Tire, Inc., Corn Products International, Inc., Equistar Chemicals, L.P., Ethyl Corporation, Ford Motor Company, Granite City Steel Division of National Steel Corp., Illinois Cement Company, LTV Steel Company, Modern Drop Forge Company, Motorola, Inc., Pharmacia Corporation, Northwestern Steel & Wire Company, Owens-Illinois, Inc., Solutia, Inc., and Viskase Corporation, as the Illinois Industrial Energy Consumers, and for their Petition for Leave to Intervene in the above entitled matter, state as follows:

1. The Petitioners are authorized to do business in the State of Illinois and operate

manufacturing and industrial plants in the State of Illinois.

2. The Petitioners are substantial users of electricity and are eligible for delivery services in the service territories of electric utilities in the State of Illinois.

3. The docket concerns the delivery service tariffs of all Illinois electric utilities to determine what, if any changes, should be ordered to promote statewide uniformity of delivery services and related tariff offerings. As stated, IIEC members are eligible for delivery services and, therefore, would be affected by any decision of the Illinois Commerce Commission (Commission) in this matter.

WHEREFORE, Petitioners pray they be granted leave to intervene accepting the schedule now in place, and become parties in addition to the IIEC group in the above styled proceeding for the purpose of submitting evidence and cross-examining witnesses and with the right to file appropriate briefs and pleadings and participate in oral argument before this Commission, should oral argument be granted.

Dated this 11th day of December, 2000.

-

Edward C. Fitzhenry
Lueders, Robertson & Konzen
1939 Delmar Avenue
P. O. Box 735
Granite City, IL 62040
(618) 876-8500

December 11, 2000

Ms. Donna Caton
Chief Clerk
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62794

Re: Uniformity of Delivery Service Tariffs
Docket No. 00-0494

Dear Ms. Caton:

The Petition for Leave to Intervene on behalf of A.E. Staley Manufacturing Company et al as the Illinois Industrial Energy Consumers has been filed electronically with the Clerk of the Illinois Commerce Commission this date. Copies of the foregoing have been provided to parties on the service list.

Sincerely,

Edward C. Fitzhenry

ECF/alc

cc: Service List

Enclosure/27524

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NOTICE OF FILING

TO: See Attached Service List

PLEASE TAKE NOTICE that on this 11th day of December, 2000, we have electronically filed with the Illinois Commerce Commission, Petition for Leave to Intervene on behalf of A.E. Staley Manufacturing Company et al as the Illinois Industrial Energy Consumers, along with Proof of Service thereon attached.

-

Edward C. Fitzhenry
Lueders, Robertson & Konzen
1939 Delmar Avenue
P. O. Box 735
Granite City, IL 62040
(618) 876-8500
ARDC No. 06180218

27524

PROOF OF SERVICE

STATE OF ILLINOIS)
) SS
COUNTY OF MADISON)

I, Edward C. Fitzhenry, being an attorney admitted to practice in the State of Illinois and one of the attorneys for A.E. Staley Manufacturing Company et al as the Illinois Industrial Energy Consumers herewith certify that I did on the 11th day of December, 2000, electrically file with the Illinois Commerce Commission, Petition for Leave to Intervene on behalf of the Illinois Industrial Energy Consumers, and serve upon the persons identified on the attached service list, both electronically and by depositing same in the United States Mail, in Granite City, Illinois with postage fully prepaid thereon.

Edward C. Fitzhenry
Lueders, Robertson & Konzen
1939 Delmar Avenue
P. O. Box 735
Granite City, IL 62040
(618) 876-8500

SUBSCRIBED AND SWORN to me, a Notary Public, on this 11th day of December, 2000.

Notary Public

STATE OF ILLINOIS, :
 :
COUNTY OF MADISON, :
 :
 :

SS

VERIFICATION

I, Edward C. Fitzhenry, being duly sworn, depose and state that I have read the foregoing Petition for Leave to Intervene on behalf of A.E. Staley Manufacturing Company et al as the Illinois Industrial Energy Consumers, and state the contents therein are true and accurate to the best of my belief and knowledge.

Edward C. Fitzhenry
Lueders, Robertson & Konzen
1939 Delmar Avenue
P. O. Box 735
Granite City, IL 62040
618-876-8500

SUBSCRIBED AND SWORN to before me, a Notary Public on this 11th day of December, 2000.

,

Notary Public

SERVICE LIST
DOCKET NO. 00-0494

Nick T. Shea
Director, Rates & Regulatory Affairs
Central Illinois Light Company
300 Liberty St.
Peoria, IL 61602
nshea@cilco.com

Robert J. Mill
Central Illinois Public Service Company
607 E. Adams St.
Springfield, IL 62739
bob_mill@ameren.com

David Eley
Interstate Power Company
& S. Beloit Water, Gas & Electric Co.
12014 Waxwing Ct.
Roscoe, IL 61073
daveeley@aliant-energy.com

Kathy Lipp
Interstate Power Company
& S. Beloit Water, Gas & Electric Co.
Alliant Energy
200 First Street., S.E., P. O. Box 351
Cedar Rapids, IA 52406-0351
KATHYLIPP@ALLIANT-ENERGY.COM

Robert P. Jared
Regulatory Law & Analysis
MidAmerican Energy Company
106 E. Second St.
P. O. Box 4350
Davenport, IA 52808
rpjared@midamerican.com

Eric Bramlet
Mt. Carmel Public Utility Co.
Koger & Bramlet, P.C.
316 ½ Market St.
P. O. Box 278
Mt. Carmel, IL 62863
kblaw@midwest.net

Bob Garcia
Illinois Commerce Commission
160 N. LaSalle, Ste. C-800
Chicago, IL 60601-3104
bgarcia@icc.state.il.us

James Hinchliff, Gerard T. Fox
Mary Klyashiff & Timothy P. Walsh
Attys. for Peoples Energy Services Corp.
130 E. Randolph Dr., 23rd Floor
Chicago, IL 60601
j.hinchliff@pecorp.com
gtfox@pecorp.com
mklyash@pecorp.com
twalsh@pecorp.com

Beth A. O'Donnell
Illinois Power Company
500 S. 27th St.
Decatur, IL 62521
beth_o'donnell@illinova.com

Robert B. Goldberg & Dale E. Thomas
Sidley & Austin
One First National Plaza
Chicago, IL 60603
rgold01@sidley.com
dthoma02@sidley.com

Thomas J. Russell
Attorney for Unicom Energy, Inc.
125 S. Clark St.
Chicago, IL 60603

Stephen J. Mattson & Joseph Paul Weber
Attys. for Nicor Energy, LLC
Mayer, Brown & Platt
190 S. LaSalle St.
Chicago, IL 60603
smattson@mayerbrown.com
jweber@mayerbrown.com

Koby Bailey
Director, Regulatory Affairs
Nicor Energy, LLC
1001 Warrenville Rd.
Lisle, IL 60532

Michael W. Hastings
Edgar Electric Cooperative Association
d/b/a EnerStar Power Corp.
P. O. Box 3787
Springfield, IL 62708-3787
hastings@fgi.net

James N. Bayne & Sabrina Austin
DukeSolutions, Inc.
P. O. Box 37998
Charlotte, NC 28237-7998

Philip O'Connor
NewEnergy Midwest, L.L.C.
309 W Washington St., Ste. 1100
Chicago, IL 60606-3205
poconnor@newenergy.com

Joseph L. Lakshmanan
Illinois Power Company
500 S. 27th Street
Decatur, IL 62521-2200
joseph_lakshmanan@illinova.com

Thomas M. Rainwater
Illinova Electric Partners, Inc.
1420 Kensington Rd., Ste. 305
Oak Brook, IL 60523
tom_rainwater@iep.illinova.com

Mark V. Allen, Vice President
John J. Stauffacher, Sr. Director
Dynegy Energy Services, Inc.
1000 Louisiana St., Ste. 5800
Houston, TX 77002

Mark Radtke & Chris Matthiesen
WPS Energy Services, Inc.
677 Baeten Rd.
Green Bay, WI 54304

mradtke@wpsenergy.com

Thomas Ihrig & David Zwitter
CMS Marketing, Services and Trading Co.
One Jackson Sq., Ste. 1060
Jackson, MI 49201
tihrig@cmsenergy.com
dmzwitte@cmsenergy.com

Edward J. Griffin
W. Michael Seidel
Defrees & Fiske
200 S. Michigan Avenue, Suite 1100
Chicago, IL 60604
egriffin@defrees.com
wmseidel@defrees.com

Christopher J. Townsend
David I. Fein
Karen S. Way
Piper Marbury Rudnick & Wolfe
203 North LaSalle Street, Ste. 1800
Chicago, IL 60601-1293
christopher.townsend@piperrudnick.com
david.fein@piperrudnick.com
karen.way@piperrudnick.com

Kevin Scanlan
Metropolitan Chicago Healthcare Council
222 S. Riverside Plaza
17th Floor
Chicago, IL 60606
kscanlan@mchc.com

Julie Voeck
Blackhawk Energy Services
N16 W23217 Stone Ridge Drive
Suite 100
Waukesha, WI 53188
(F) 262-506-5511
jvoeck@blackhawkenergyservices.com

Kennan J. Walsh
Julie M. Hextell
NewEnergy Midwest, L.L.C.
309 W. Washington St., Suite 1100

Chicago, IL 60606

27522

kwalsh@newenergy.com

jhextell@newenergy.com

Cynthia A. Fonner

Hopkins & Sutter

Three First National Plaza

Suite 4100

Chicago, IL 60602-4205

cfonner@hopsut.com

Susan M. Landwehr

Enron Energy Services, Inc.

900 Second Avenue South, Suite 890

Minneapolis, MN 55402

Susan_M_Landwehr@enron.com

Helen L. Liebman

Jones, Day, Reavis & Pogue

1900 Huntington Center

41 South High Street

Columbus, OH 43215

hlliebman@jonesday.com

E. Glenn Rippie

Commonwealth Edison Company

Two First National Plaza

20 S. Clark Street

Suite 500

Chicago, IL 60603

Glenn.Rippie@exeloncorp.com

Darcy Hackel

Alliant Energy

222 West Washington Avenue

P. O. Box 192

Madison, WI 53701-0192

darcyhackel@alliant-energy.com

Owen E. MacBride

Schiff Hardin & Waite

6600 Sears Tower

Chicago, IL 60606

(F) 312-258-5700

(E) omacbride@schiffhardin.com

